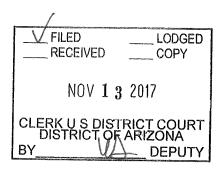
Case 2:17-cv-04168-DKD Document 1 Filed 11/13/17 Page 1 of 62

KAMAL HAJIRI vs HOME OF DOMAINS SANDRA DAY O'CONNOR U.S. COURTHOUSE COMPLAINT FOR A CIVIL CASE

Kamal Hajiri Weteringkade 22B 2515 AP's Gravenhage THE NETHERLANDS kamalhajiri@hotmail.com

October 26, 2017



Sandra Day O'Connor U.S. Courthouse To: Brian D. Karth 401 W. Washington St, Suite 130 SPC 1 Phoenix, AZ 85003-2118 United States of America

CV-17-04168-PHX-DKD

Dear Brian D. Karth,

I am Kamal Hajiri, owner of several registered patents (EUIPO and USPTO), copyrights and the trademark 'DIVA STASH®'. As such, I like to start a complaint for a civil case because of my complaint at the Czech Arbitration Court with case number 101662 has been rejected on 17-10-2017.

I started the UDRP procedure because of trademark and copyright infringement on disputed domain name 'www.divastash.com' by 'HOME OF DOMAINS' which causes me damage. The word 'divastash' is an invented word. It does not appear in any dictionary and therefore, the word 'divastash' is to be considered as my copyright. The registration of EUTM under number 016917536 for containers for cosmetics, trunks and suitcases, cupboards and mirrors in Nice classes 18, 20 and 21 was earlier than the registration of divastash.com by Home of Domains.

EUTM 016917536 registration by Kamal Hajiri Divastash.com registration by Home of Domains 06/24/2017

14:32:41 Zulu Time Zone

06/24/2017

15:16:15 Zulu Time Zone

The domain name is identical to my trademark and also infringers on my copyright. The term 'divastash' has never been used for websites, trademarks or any commercial activity and therefore not known by the public until EUTM-office published the application on 05th July 2017. These circumstances indicating internet fraud, cybersquatting and preventing the owner of the trademark from reflecting the mark in a corresponding domain name. Home of Domains' bad faith is also evidenced by offering the website for sale, which also constitutes trademark and copyright infringement. This company has been involved in several UDRP complaints over the years because they track newly filed trademarks and check the terms as .com domain names. If the domain is available they register it and list the domain name for \$ 950,--.

I, Kamal Hajiri have sent several warning letters by email and registered mail started on 09 July 2017 to stop the infringing use of the disputed domain name immediately. Up until now, these letters remained unanswered.

TERS DOCUMENT IS <u>NOT</u> IN PROPER FORM ACCORDING TO PEDERAL AND/OR LOCAL RULES AND PRACTICES

AND IS SUBJECT TO REJECTION BY THE COURT.

REFERENCE

(Rule Number/Section)

KAMAL HAJIRI vs HOME OF DOMAINS SANDRA DAY O'CONNOR U.S. COURTHOUSE COMPLAINT FOR A CIVIL CASE

Copy of the warning letters and printscreens of the disputed website as well as results of the EUIPO and EUTM database of TM number 016917536, the decision of the Czech Arbitration Court with case number 101662 and relevant documents have been attached to the complaint as an annex. (appendix 01 - 30).

I, Kamal Hajiri started this project in 2013 to find the best solutions for women to store their nail polish and make up in a practical and stylish way. Different in this engineering-project is that time and money are subordinate to find the best solution of makeup storage. With the registration of all designs and trademark at the EUIPO the investment must be recouped. For marketing purposes it is of utmost importance that the disputed domain name 'www.divastash.com' to be transferred to the owner of the trademark.

Also the inaccessibility of the CEO Mr. Goldfarb, the support desk of namesilo.com and Home of Domains makes it very bad. As a company they should know how it feels getting robbed like this.

All the above leads to the conclusion that Home of Domains has registered and is using the disputed domain name in bad faith.

I hope to have you informed enough to make a decision in this case.

Best Regards,

Kamal Hajiri

KAMAL HAJIRI vs HOME OF DOMAINS SANDRA DAY O'CONNOR U.S. COURTHOUSE COMPLAINT FOR A CIVIL CASE

APPENDIX 01	PROGRESS PROCEDURE
APPENDIX 02	EMAIL CORRESPONDANCE C&D LETTER HOD
APPENDIX 03	WHOIS https www.whois.com whois divastash
APPENDIX 04	website infringement divastash
APPENDIX 05	website infringement by namesilo
APPENDIX 06	EUTM 016917536
APPENDIX 07	EM500000016917536
APPENDIX 08	REPLY HOD ON C&D LETTER 07-10-2017
APPENDIX 09	EMAIL CORRESPONDANCE NAMESILO REPORT ABUSE
APPENDIX 10	EMAIL CORRESPONDANCE NAMESILO 01
APPENDIX 11	EMAIL CORRESPONDANCE NAMESILO 02
APPENDIX 12	CHAT namesilo
APPENDIX 13	EMAIL CORRESPONDANCE C&D LETTER HOD
APPENDIX 14	EMAIL CORRESPONDANCE C&D LETTER NAMESILO
APPENDIX 15	REGISTERED MAIL C&D LETTER NAMESILO
APPENDIX 16	RECEIPT REGISTERED MAIL C&D LETTER NAMESILO
APPENDIX 17	website infringement by namesilo
APPENDIX 18	website infringement divastash
APPENDIX 19	RECEIPT REGISTER MAIL C&D LETTER NAMESILO RECEIVED
APPENDIX 20	NAMESILO Reseller Complaint & Policies
APPENDIX 21	website infringement divastash
APPENDIX 22	website infringement by namesilo
APPENDIX 23	27082017_HAJIRI_EUIPO_dsv-result-list
APPENDIX 24	27082017_HAJIRI_EUIPO_dsv-result-list
APPENDIX 25	websites registration divastash
APPENDIX 26	social media registration divastash
APPENDIX 27	Hajiri UDRP Complaint 101662 letter
APPENDIX 28	UDRP decision Czech Arbitration Court with case number 101662
APPENDIX 29	WHOIS https www.whois.com whois divastash - Zulu Time Zone
APPENDIX 30	EUTM 016917536 final receipt - Zulu Time Zone

10/26/2017

APPENDIX I PROGRESS PROCEDURE.txt

06/07/2017

08/07-2017

09/07/2017

09/07/2017 09/07/2017

10/02/2017

10/07/2017

11/07/2017

11/07/2017

11/07/2017

11/07/2017

11/07/2017

12/07/2017

17/07/2017 17/07/2017

18/07/2017

24/07/2017 24/07/2017 18/08/2017

RESELLER COMPLAINT AND POLICIES COMPANY NAMESILO.COM (APP. 20)

START PROCEDURE at UDRP ADR 25/08/2017

25/08/2017 25/08/2017 28/08/2017 28/08/2017

28/08/2017

infringement www.DIVASTASH.COM (APP. 21) infringement company NAMESILO.COM (APP. 22) EUJPO DSN ESULITS HAJIRI 27/08/2017 (APP. 24) EUJPO DSV RESULIS HAJIRI 27/08/2017 (APP. 24)

COMPLAINT SENT TO UDRP ADR infringement www.divastash.com

Pagina 1

APPENDIX 01 PROGRESS PROCEDURE

28/08/2017

APPENDIX 01 TO 24

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO

pagina 1 van 8

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO CASE 101662

APPENDIX 02 EMAIL CORRESPONDANCE C&D LETTER HOD

2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Kamal

di 11-7-2017 20:46

Aandomain@homeofdomains.com <domain@homeofdomains.com>;

Urgentie Hoog

6 bijlagen (2 MB)

divastash,pdf, APPENDIX II website infringement divastash,jpg; APPENDIX III website infringement by namesilo,jpg; 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf, APPENDIX I_https www.whois.com whois APPENDIX IV EUTM 016917536.jpg; APPENDIX V EMS0000016917536.pdf,

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: zondag 9 juli 2017 16:32

Aan: domain@homeofdomains.com; domain@homeofdomains.com; admin@homeofdomains.com Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Weteringkade 22B Kamal Hajiri

2515 AP 's Gravenhage

THE NETHERLANDS

kamalhajiri@hotmail.com

July 10, 2017

Via E-mail and Letter Mail HOME OF DOMAINS

1928 E. Highland Avenue. Ste F104 PMB# 255

Phoenix, AZ 85016

Dear Sirs,

 ${
m STASH}^{\otimes 2}$. As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered

https://outlook.live.com/owa/?path=/mail/sentitems/rp

28/08/2017

APPENDIX 01 TO 24

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person can be held liable for damages - up to \$100,000 per domain. 15 U.S.C. § 1117(d).

interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the In short, I consider this to be a very serious matter and I will take all necessary and appropriate you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®, with you or your commercial activities in any way, at any point in the future; and
 - iii. you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH®'

APPENDIX III website infringement 'DIVA STASH®; by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

pagina 5 van 8 12-7-2017 https://outlook.live.com/owa/?path=/mail/sentitems/rp APPENDIX II website infringement divastash.jpg APPENDIX II website infringement divastash.jpg APPENDIX IV EUTM 016917536 E-mail - kamalhajiri@hotmail.com pagina 4 van 8 12-7-2017 APPENDIX III website infringement 'DIVA STASH®, by namesilo APPENDIX II website infringement 'DIVA STASH®', https://outlook.live.com/owa/?path=/mail/sentitems/rp APPENDIX II website infringement divastash.jpg E-mail - kamalhajiri@hotmail.com

Current trade mark status Application published APPENDIX V EM50000016917536 Opposition period start date 2017-07-05 219)(260) Application number 016917536 (531)((532) Vienna classification 03.13.01 Receiving office number E63398696 Frade mark office EUIPO - EUIPO Receiving office date 2017-06-24 Application date 2017-06-24 (sso) Trade mark type Figurative (s11) Nice classification 18,20,21 (ssı) Kind of mark Individual (270) Application language nl (1991) Registration office EM Status date 2017-07-05 Second language en DIVA STASH **Trade** mark 09/07/2017

Publication number Publication section Publication date Publication page

No entry for application number EM50000016917536

Publication

No entry for application number EM50000016917536

Exhibition priority

Priority

No entry for application number EM50000016917536

International registration transformation

09/07/2017

No entry for application number EM50000016917536

No entry for application number EM50000016917536

740) Representative

(750) Correspondence address

350) Seniority

27 - 06 - 2017 T_EXA_VALID_CLASS_FEE 05 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE 27-06-2017 T_EXA_MOD_DOSSIER_MILESTONE 03 - 07 - 2017 T_EXA_REQ_TRANS 03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE 24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE No entry for application number EM50000016917536 27 - 06 - 2017 T_EXA_VALID_BASIC_FEE EXA FEES FIN CHECK 27 - 06 - 2017 T EXA CLASSIFICATION 24 - 06 - 2017 T_EXA_PROV_FIL_DATE 28 - 06 - 2017 T_EXA_LANG_CHECK 29 - 06 - 2017 T_EXA_ABS_GROUNDS 27 - 06 - 2017 T_EXA_NOTIFICATION 27 - 06 - 2017 T EXA NOTIFICATION 27 - 06 - 2017 T EXA COM SEARCH sso) Event date Event description 05-07-2017 T EXA_PUBL_A1 24 - 06 - 2017 T EXA KEY IN 03 - 07 - 2017 T EXA FORM 2017/125 A.1 2017-07-05 0 Trade mark events 03 - 07 - 2017 T Cancellation 09/07/2017 Opposition Recordals

List of goods and services Opbergmeubelen; Spiegels.

List of goods and services Cosmeticahouders.

(842) Applicant legal entity Physical Person

Applicant nationality code MA

Organization name Kamal Hajiri

Applicant identifier 687778

Name Kamal Hajiri

(130)((131))((132)((133) Owner

Applicant incorporation country code NL

Address country NL

Address country NL

Street Weteringkade 22B

Postcode 2515 AP City Den Haag

List of goods and services Reiskoffers en koffers.

(s11) Nice class number 20 (sn) Nice class number 21

Opposition period end date 2017-10-05

(s21) Acquired distinctiveness false

(s10) List of goods and services

(s11) Nice class number 18

09/07/2017 2/4 No entry for application number EM50000016917536 No entry for application number EM50000016917536 No entry for application number EM50000016917536 Renewals Appeals

https://outlook.live.com/owa/?path=/mail/sentitems/rp

https://outlook.live.com/owa/?path=/mail/sentitems/rp

pagina 8 van 8

12-7-2017

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

APPENDIX 03 WHOIS https www.whois.com whois divastash

APPENDIX 01 TO 24

28/08/2017

HERIOG BND IERRE DF USIT YOU ARE NOT HIROTIZED TO YOURSELVE APPROVED THE STATE OF T

absict unclaimed. USDs of the IVANI WHOTE have broken benefits byttem: Nigoti/wapes.incernleinet/ inan update of MHOTE declarate; 2017-(7-07 £413454)

Email: donain@httmetifataa.ns.com Strven: HSL.DNGCMD.com Server: HSL.DNGCMD.com Server: HSL.DNGCMD.com

Canify for everyons

Whois divastash.com

CLOUD WEBSITES EMAIL SECURITY WHOIS SUPPORT

Southern Main II: Southern Main II: Admin Word David Admin / Chilo Dansin to For Sole Admin Germaniatistis Man of Commiss Admin Server; 1929 F. Withlens Nec, 219 Fl.4 1982 255

registrant fam Ext: Agastvant Emall: **demain**éhousandemana.com

Agnitiant Pouth Code: 65015 Medition Country: US Agnitiant Phone: 41,2414717726 Megistiant Phone Ext; Agnitiant Phone

WHOIS

NISOI

Whois divastash.com

pagina 1 van 3

divastash.com

DOMAIN INFORMATION

DOMAINS HOSTING

Updated 1 second ago 🔾

clientTransferProhibited ns1.dnsawl.com ns2.dnsawl.com ns2.dnsowl.com NAMESTLO, LLC 2017-06-24 2017-06-24 Registration Date: Status: Namo Servers. Expiration Date: Updated Date: Registrar:

1928 E. Highland Ave. Ste F104 PMB# 255 Domain Admin / This Domain is For Sale Home of Domains REGISTRANT CONTACT 85016 Organization. Postal Codo.

donain@homeofdomams.com +1,3478717726

Home of Domains 1928 E. Highland Ave. Ste F104 PMB# 255 Phoenix Domain Admin / This Domain is For Sale ADMINISTRATIVE CONTACT

donain@homeofdomains.com +1,3478717728 TECHNICAL CONTACT

Postal Code:

Country:

Home of Domains 1928 E. Hightand Ave. Ste F104 PMB# 255 Domain Admin / This Domain is For Sale donatn@homeofdomains.com +1,3478717726 Organication: Postal Code: Country.

RAW WHOIS DATA

Compared through and the compared to the compa

space.

88.0, 88.8 BUY NOW Sec. 6 to 22.11.25.17.17.5

Hot Deals!

Test North Command Additory of Education at for Solu-tion Constitution, New York Communication of Communication, New York Communication of Co

donain@homes Cassailns.com

Amain Strong, 1925 h. 3540000 Amain City, Raceald. Amain Strate/Produces A.2 Amain Revial Cydes 22019 Amain Conney; US Amain Phone 24: -1.134797.7726 Amain Phone Ext; Amain Pas Ext;

① site

SITE @ \$3.28 \$28.88

30 Day Money Back Guarantee Web Hosting Unlimited Email Accounts Unlimited Data Transfer Unimited Disk Space Unlimited Dalabases



related domain names חממולייימחיים מימניםוניםיות מו

some clacks and

learnuorg homeoldornana.com

Follow us Hosting & Products

Linux Hosting

Register Domain Name Transfer Domain Name

Domains

Windows Reseller Hosting Linux Reseller Hosting Virtual Private Servers Dedicated Servers Windows Hosting Managed Servers

> Name Suggestion Tool **Bull-Domain Register** View Domain Pricing

Whois Lookup

Enter a Domain Name

Enterprise Email Website Builder Business Email Cloud Hosting Free with Every Domain

SSL Certificates 24 x 7 Servers Monitoring Datacenter Details Hosting Security Infrastructure Domain Offers

G, LOGIN

CREATE AN ACCOUNT

pagina 3 van 3

CodeGuard Sitelock

Backup and Recovery

Report Abuse

About Whois

Copyright & Whols.com. All rights reserved Privacy Policy [1:23al Agreement View Knowledge Base Contact Support

Support

APPENDIX 04 website infringement divastash

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

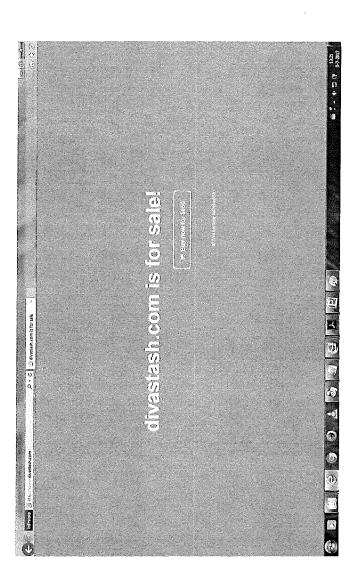
APPENDIX 01 TO 24

28/08/2017

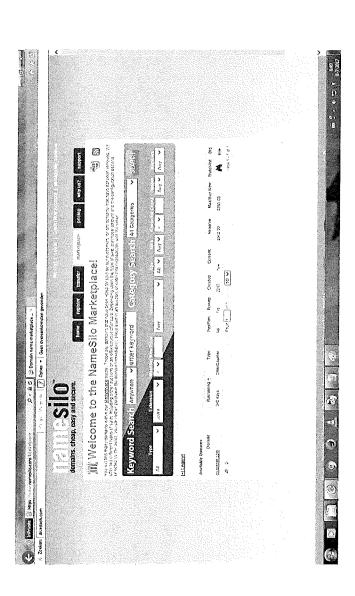
8-7-2017

https://www.whois.com/whois/divastash.com

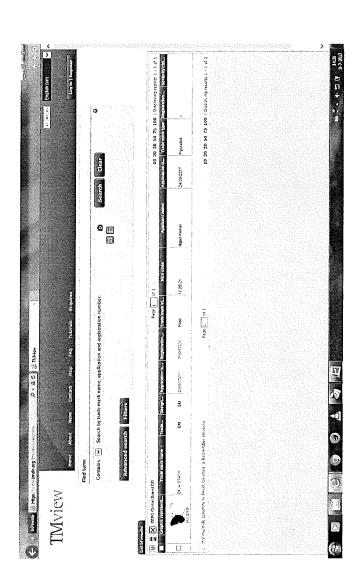
APPENDIX 05 website infringement by namesilo



APPENDIX 06 EUTM 016917536



APPENDIX 07 EM500000016917536



IMview

Trade mark

DIVA STASH



016917536	ŢĊ.	2017-06-24	en	EUIPO - EUIPO	EM	E63398696	2017-06-24	Figurative	Individual	18,20,21	03.13.01	Application published	2017-07-05	2017-07-05	2017-10-05	false
стоугаю, Application number	(270) Application language	(220) Application date	Second language	Trade mark office	(190) Registration office	Receiving office number	Receiving office date	(sso) Trade mark type	(ss1) Kind of mark	(611) Nice classification	(รวาม(รวร Vienna classification	Current trade mark status	Status date	Opposition period start date	Opposition period end date	(521) Acquired distinctiveness

(S10) List of goods and services

ALAYSI.	
43.00	
\$40000	
18986	
200 EN	
500000	
-0.01	
25.54	
11.4.0	
	ω
	_
10.00	
10000	
10.349	
1300	
100000	
1000	
100	
1.00	
3.183	<u></u>
1,540	Ψ
	끋
	⊏
0.888	⋾
45.55	_
	10
3.55	16
	ö
	-75
	_
100	Ø)
1.0	. <u>∪</u>
49.8	ラ
10.00	_
(A N	(sn) Nice class number
	2
Z	=
1 - 1 - 1 - 1	

IMview

09/07/2017

09/07/2017

NL	
List of goods and services	Reiskoffers en koffers.
(611) Nice class number	20
List of goods and services	Opbergmeubelen; Spiegels.
(s11) Nice class number	21
List of goods and services	Cosmeticahouders.

(730)/(731)/(732)/(733) Owner

Applicant identifier	687778
Name	Kamal Hajiri
Organization name	Kamal Hajiri
(842) Applicant legal entity	Physical Person
Applicant nationality code	MA
Applicant incorporation country code NL	NL
Address country	NL
Address country	NL
Street	Weteringkade 22B
City	Den Haag
Postcode	2515 AP

(740) Representative

No entry for application number EM50000016917536

(750) Correspondence address

(350) Seniority

No entry for application number EM50000016917536

Exhibition priority

No entry for application number EM50000016917536

Priority

No entry for application number EM50000016917536

International registration transformation

09/07/2017

Cancellation

No entry for application number EM50000016917536

Appeals

Publication page

Publication number Publication section Publication date

No entry for application number EM50000016917536

Publication

MWiew

2017-07-05

A.1

2017/125

No entry for application number EM50000016917536

Renewals

No entry for application number EM50000016917536

No entry for application number EM50000016917536

Trade mark events	
(580) Event date	Event description
27 - 06 - 2017	T_EXA_VALID_BASIC_FEE
27 - 06 - 2017	T_EXA_NOTIFICATION
27 - 06 - 2017	T_EXA_NOTIFICATION
27 - 06 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
27 - 06 - 2017	T_EXA_VALID_CLASS_FEE
05 - 07 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017	T_EXA_PROV_FIL_DATE
28 - 06 - 2017	T_EXA_LANG_CHECK
27 - 06 - 2017	T_EXA_CLASSIFICATION
29 - 06 - 2017	T_EXA_ABS_GROUNDS
03 - 07 - 2017	T_EXA_FEES_FIN_CHECK
24 - 06 - 2017	T_EXA_KEY_IN
27 - 06 - 2017	T_EXA_COM_SEARCH
03 - 07 - 2017	T_EXA_FORM
03 - 07 - 2017	T_EXA_REQ_TRANS
03 - 07 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
05 - 07 - 2017	T_EXA_PUBL_A1

Recordals

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO

CASE 101662

pagina I van 8

DOMAINS_cease_and_desist_letter Ynt: 2017-07-10 Hajiri_HOME OF

Home of Domains Home of Domains <domain@homeofdomains.com>

zo 9-7-2017 20:55

APPENDIX 08 REPLY HOD ON C&D LETTER 07-10-2017

AsarKamal <kamalhajiri@hotmail.com>; admin@homeofdomains.com <admin@homeofdomains.com>;

Dear Customer,

Divastash.com is for sale on NameSilo.com, 950 USD

There is no other opportunity to buy this premium name

Buy Link: www.divastash.com

Best Regards

Gönderen: Kamal <kamalhajiri@hotmail.com> Gönderildi: 9 Temmuz 2017 Pazar 17:32:53

Kime: Home of Domains Home of Domains; Home of Domains Home of Domains;

KBnu: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter admin@homeofdomains.com

CEASE & DESIST DEMAND

Kamal Hajiri

Weteringkade 22B

2515 AP 's Gravenhage

THE NETHERLANDS

kamalhajiri@hotmail.com

July 10, 2017

Via E-mail and Letter Mail

1928 E. Highland Avenue. Ste F104 PMB# 255 HOME OF DOMAINS

Phoenix, AZ 85016

Dear Sirs,

cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else. STASH²⁹. As such, I write because you are infringing on my trademark and causing me damage by I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered

APPENDIX 01 TO 24

28/08/2017

https://outlook.live.com/owa/?path=/mail/inbox/rp

pagina 2 van 8

E-mail - kamalhajiri@hotmail.com

9-7-2017

mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also person can be held liable for damages - up to \$100,000 per domain. 15 U.S.C. § 1117(d).

interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the In short, I consider this to be a very serious matter and I will take all necessary and appropriate you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any point in the future; and
 - you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH®,

APPENDIX III website infringement 'DIVA STASH[®], by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

APPENDIX I https www.whois.com whois 'www.divastash.com'

https://outlook.live.com/owa/?path=/mail/inbox/rp

9-7-2017

https://outlook.live.com/owa/?path=/mail/inbox/rp

9-7-2017 pagina 5 van 8 https://outlook.live.com/owa/?path=/mail/inbox/rp APPENDIX II website infringement divastash.jpg APPENDIX II website infringement divastash.jpg APPENDIX IV EUTM 016917536 E-mail - kamalhajiri@hotmail.com 9-7-2017 pagina 4 van 8 APPENDIX III website infringement 'DIVA STASH®, by namesilo APPENDIX II website infringement 'DIVA STASH®' https://outlook.live.com/owa/?path=/mail/inbox/rp APPENDIX II website infringement divastash.jpg E-mail - kamalhajiri@hotmail.com

9-7-2017

No entry for application number EM50000016917536

(350) Seniority

Exhibition priority

No entry for application number EM50000016917536

Priority

No entry for application number EM50000016917536

International registration transformation

09/07/2017

No entry for application number EM50000016917536

Publication

No entry for application number EM50000016917536

Recordals

Trade mark events

ism Event date Event description

Current trade mark status Application published

(s31)/(s32) Vienna classification 03.13.01

Opposition period start date 2017-07-05 Opposition period end date 2017-10-05

Status date 2017-07-05

(s21) Acquired distinctiveness false

(sto) List of goods and services

(s11) Nice class number 18

09/07/2017

27 - 06 - 2017 T EXA CLASSIFICATION

List of goods and services Opbergmeubelen; Spiegels.

List of goods and services Cosmeticahouders.

(s11) Nice class number 21

(842) Applicant legal entity Physical Person Applicant incorporation country code NL

Applicant nationality code MA

Street Weteringkade 22B

Postcode 2515 AP

City Den Haag

Address country NL Address country NL

Organization name Kamal Hajiri

Applicant identifier 687778

Name Kamal Hajiri

(730)/(731)/(732)/(733) Owner

List of goods and services Reiskoffers en koffers.

(s11) Nice class number 20

05 - 07 - 2017 T_EXA_PUBL_A1

Cancellation

No entry for application number EM50000016917536

9-7-2017

pagina 6 van 8

E-mail - kamalhajiri@hotmail.com

(219)(126) Application number 016917536

DIVA STASH

Trade mark 09/07/2017

Receiving office number E63398696

(199) Registration office EM

Receiving office date 2017-06-24

(550) Trade mark type Figurative (s11) Nice classification 18,20,21

(551) Kind of mark Individual

Frade mark office EUIPO - EUIPO

Second language en

(220) Application date 2017-06-24

(270) Application language nl

APPENDIX V EM50000016917536

(740) Representative

(780) Correspondence address

Publication number Publication section Publication date Publication page 2017/125 A.1 2017-07-05 0

Opposition

27 - 06 - 2017 T_EXA_VALID_BASIC_FEE 27 - 06 - 2017 T_EXA_NOTIFICATION

27 - 06 - 2017 T_EXA_NOTIFICATION 27 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE

27-06-2017 T_EXA_VALID_CLASS_FEE 05-07-2017 T_EXA_MOD_DOSSIER_MILESTONE 24-06-2017 T_EXA_MOD_DOSSIER_MILESTONE

24-06-2017 T_EXA_PROV_FIL_DATE 28-06-2017 T_EXA_LANG_CHECK

29 - 06 - 2017 T_EXA_ABS_GROUNDS 03 - 07 - 2017 T_EXA_FEES_FIN_CHECK

24 - 06 - 2017 T_EXA_KEY_IN 27 - 06 - 2017 T_EXA_COM_SEARCH

03 - 07 - 2017 T EXA FORM

03 - 07 - 2017 T_EXA_REQ_TRANS 03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE

09/07/2017

No entry for application number EM50000016917536 Appeals

Renewals

No entry for application number EM500000016917536

pagina 8 van 8

9-7-2017

28/08/2017

APPENDIX 01 TO 24

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

APPENDIX 09 EMAIL CORRESPONDANCE NAMESILO REPORT ABUSE

2017-07-10 Hajiri_NAMESILO_cease_and_desist_letter

Kamal

zo 9-7-2017 16:00

Aลก:abuse@namesilo.com <abuse@namesilo.com>;

Urgentie: Hoog

6 bijlagen (2 MB)

APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; APPENDIX IV EUTM 2017-07-10Hajiri_NAMESILO_cease_and_desist_letter.pdf; APPENDIX I_https www.whois.com whois divastash.pdf; 016917536.jpg; APPENDIX V EMS0000016917536.pdf;

CEASE & DESIST DEMAND

Kamal Hajiri

2515 AP 's Gravenhage Weteringkade 22B

kamalhajiri@hotmail.com THE NETHERLANDS

Via E-mail and Letter Mail

NAMESILO

1300 E. Missouri Avenue Phoenix, AZ 85014 Suite A-110

Dear Mr. Goldfarb,

cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is STASH®. As such, I write because you are infringing on my trademark and causing me damage by I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith mark. Infringement only for profit purposes and damages the goodwill of the registered mark that intent to profit from another's mark and the domain name is confusingly similar to my registered result in the loss of the rights to the market.

constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also person can be held liable for damages – up to \$100,000 per domain. 15 U.S.C. § 1117(d).

E-mail - kamalhajiri@hotmail.com

pagina 2 van 9

interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the In short, I consider this to be a very serious matter and I will take all necessary and appropriate you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®, with you or your commercial activities in any way, at any point in the future; and
 - you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

July 10, 2017

APPENDIX II website infringement 'DIVA STASH®:

APPENDIX III website infringement 'DIVA STASH®' by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

APPENDIX I https www.whois.com whois 'www.divastash.com'

27-8-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

27-8-2017

pagina 6 van 9

APPENDIX II website infringement divastash.jpg

E-mail - kamalhajiri@hotmail.com

09/07/2017

a20) Application date 2017-06-24 (270) Application language nl

Trade mark office EUIPO - EUIPO

Receiving office number E63398696 Receiving office date 2017-06-24

(sso) Trade mark type Figurative (ssı) Kind of mark Individual

(su) Nice classification 18,20,21

Current trade mark status Application published

Opposition period start date 2017-07-05 Opposition period end date 2017-10-05 (s21) Acquired distinctiveness false

APPENDIX II website infringement divastash, jpg

APPENDIX IV EUTM 016917536

09/07/2017

2/4

List of goods and services Reiskoffers en koffers.

(sn) Nice class number 21

Applicant identifier 687778 (730)A(732)A(733) **Owner**

Name Kamal Hajiri

Organization name Kamal Hajiri

Address country NL

City Den Haag

https://outlook.live.com/owa/?path=/mail/sentitems/rp

27-8-2017

27-8-2017

APPENDIX V EM50000016917536

E-mail - kamalhajiri@hotmail.com

pagina 5 van 9

Frade mark

anowaso, Application number 016917536 DIVA STASH

Second language en

(190) Registration office EM

(531)/(532) Vienna classification 03.13.01 Status date 2017-07-05

(S10) List of goods and services (sii) Nice class number 18

(s11) Nice class number 20

List of goods and services Opbergmeubelen; Spiegels.

List of goods and services Cosmeticahouders.

(842) Applicant legal entity Physical Person Applicant nationality code MA

Applicant incorporation country code NL

Street Weteringkade 22B Address country NL

https://outlook.live.com/owa/?path=/mail/sentitems/p

27-8-2017

```
Publication number Publication section Publication date Publication page
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    27 - 06 - 2017 T_EXA_NOTIFICATION
27 - 06 - 2017 T_EXA_NOTIFICATION
27 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
27 - 06 - 2017 T_EXA_VALID_CLASS_FEE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      05-07-2017 TEXA MOD DOSSIER MILESTONE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017 T_EXA_PROV_FIL_DATE
28 - 06 - 2017 T_EXA_LANG_CHECK
27 - 06 - 2017 T_EXA_CLASSIFICATION
29 - 06 - 2017 T_EXA_ABS_GROUNDS
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      03 - 07 - 2017 T_EXA_REQ_TRANS
03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
                                                                                                                                                                                            No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                       No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                     No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                         No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            No entry for application number EM500000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        27 - 06 - 2017 T_EXA_VALID_BASIC_FEE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              03 - 07 - 2017 T_EXA_FEES_FIN_CHECK
                                                                                                                                                                                                                                                                                                                                                                                                                                                            International registration transformation
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  27 - 06 - 2017 T_EXA_COM_SEARCH
03 - 07 - 2017 T_EXA_FORM
E-mail - kamalhajiri@hotmail.com
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               (530) Event date Event description
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         05-07-2017 T_EXA_PUBL_A1
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      24 - 06 - 2017 T_EXA_KEY_IN
                                                                                                                                                                                                                        (750) Correspondence address
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           2017/125 A.1 2017-07-05 0
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            Trade mark events
                                                                                                                                                                                                                                                                                                                       Exhibition priority
                                                                                                                                                              740) Representative
                                                                                                                        Postcode 2515 AP
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          Cancellation
                                                                                                                                                                                                                                                             350) Seniority
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      09/07/2017
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             Publication
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               Opposition
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           09/07/2017
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           Recordals
                                                                                                                                                                                                                                                                                                                                                                                         Priority
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               Appeals
```

27-8-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

APPENDIX 10 EMAIL CORRESPONDANCE NAMESILO 01

APPENDIX 01 TO 24

28/08/2017

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

pagina 1 van 9

E-mail - kamalhajiri@hotmail.com

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO

CASE 101662

APPENDIX 11 EMAIL CORRESPONDANCE NAMESILO 02

RESELLER PROBLEM - 2017-07-10 Hajiri_HOME OF

DOMAINS_cease_and_desist_letter

Kamal

di 11-7-2017 18:35

Aan:Support@namesilo.com <support@namesilo.com>;

Urgente: Hoog

5 bijlagen (1 MB)

APPENDIX L.https www.whois.com whois divastash.pdf, APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM50000016917536.pdf,

Dear Sirs,

Can you confirm receipt of my letter, please?

Kindest Regards,

Kamal Hajiri

Van: Home of Domains Home of Domains <domain@homeofdomains.com>

Verzonden: zondag 9 juli 2017 20:55

Aan: Kamal; admin@homeofdomains.com

Onderwerp: Ynt: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Dear Customer,

Divastash.com is for sale on NameSilo.com, 950 USD

There is no other opportunity to buy this premium name

Buy Link: www.divastash.com

Best Regards

APPENDIX 01 TO 24

28/08/2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO

CASE 101662

APPENDIX 12 CHAT namesilo

RESELLER PROBLEM

Kamal

di 11-7-2017 00:58

Ash Support@namesilo.com < support@namesilo.com>;

Urgentie Hoog

1 bijlagen (204 kB)

Antw_HOD_2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf,

Dear Sirs,

I have tried to reach online support by telephone but when I call nobody answers.
You can't also leave a voicemail message.

Can you please take immediately action. Thank you very much for your help.

Best Regards,

Kamal Hajiri

Van: Kamal <kamalhajiri@hotmail.com> Verzonden: dinsdag 11 juli 2017 00:38 Aan: support@namesilo.com Onderwerp: RESELLER PROBLEM

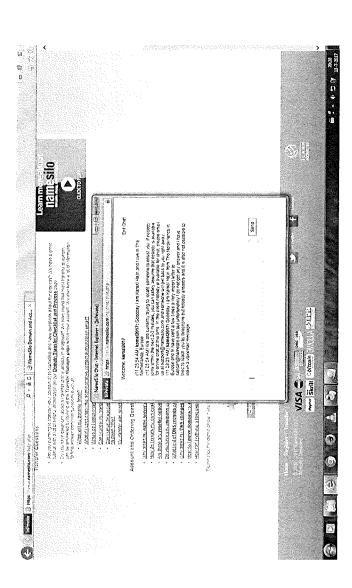
Dear Sirs,

Can You PLEASE confirm that you have received my complaint.

APPENDIX 01 TO 24

28/08/2017

APPENDIX 13 EMAIL CORRESPONDANCE C&D LETTER HOD



2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Kamal

di 11-7-2017 20:46

Aan:donnain@homeofdomains.com <donnain@homeofdomains.com>;

Urgentie: Hoog

6 bijlagen (2 MB)

divastash.pdf, APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf, APPENDIX I_https www.whois.com whois APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM50000016917536.pdf;

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: zondag 9 juli 2017 16:32

Aan: domain@homeofdomains.com; domain@homeofdomains.com; admin@homeofdomains.com Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Kamal Hajiri

2515 AP 's Gravenhage Weteringkade 22B

THE NETHERLANDS

kamalhajiri@hotmail.com

July 10, 2017

Via E-mail and Letter Mail

HOME OF DOMAINS

1928 E. Highland Avenue. Ste F104 PMB# 255 Phoenix, AZ 85016

Dear Sirs,

cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is STASH®: As such, I write because you are infringing on my trademark and causing me damage by I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered https://outlook.live.com/owa/?path=/mail/sentitems/rp

mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 faith, registers a domain name that is identical or confusingly similar to the trademark of another U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also person can be held liable for damages - up to \$100,000 per domain. 15 U.S.C. § 1117(d).

interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the In short, I consider this to be a very serious matter and I will take all necessary and appropriate you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any point in the future; and
 - you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH[®]'

APPENDIX III website infringement 'DIVA STASH®' by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

12-7-2017

pagina 4 van 8

APPENDIX II website infringement 'DIVA STASH®',

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH®, by namesilo

pagina 3 van 8

E-mail - kamalhajiri@hotmail.com

https://outlook.live.com/owa/?path=/mail/sentitems/rp

E-mail - kamalhajiri@hotmail.com

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

pagina 5 van 8

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

APPENDIX V EM50000016917536

APPENDIX II website infringement divastash.jpg

E-mail - kamalhajiri@hotmail.com

09/07/2017

anyasa, Application number 016917536

(190) Registration office EM

Receiving office date 2017-06-24 (ss)) Trade mark type Figurative

(831)/(832) Vienna classification 03.13.01

Current trade mark status Application published Status date 2017-07-05

(s21) Acquired distinctiveness false

(sto) List of goods and services

09/07/2017

List of goods and services Reiskoffers en koffers.

List of goods and services Cosmeticahouders.

Applicant identifier 687778

Name Kamal Hajiri

Organization name Kamal Hajiri

Address country NL

City Den Haag

Postcode 2515 AP

Frade mark

DIVA STASH

(220) Application date 2017-06-24 (270) Application language nl

Second language en Trade mark office EUIPO - EUIPO

Receiving office number E63398696

(ssi) Kind of mark Individual

(su) Nice classification 18,20,21

Opposition period start date 2017-07-05

Opposition period end date 2017-10-05

APPENDIX II website infringement divastash.jpg

APPENDIX IV EUTM 016917536

(str) Nice class number 18

(sn) Nice class number 20

List of goods and services Opbergmeubelen; Spiegels. (sn) Nice class number 21

(730)4(731)4(732)4(733) Owner

(842) Applicant legal entity Physical Person Applicant incorporation country code NL Applicant nationality code MA

Street Weteringkade 22B Address country NL

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

No entry for application number EM50000016917536

```
pagina 7 van 8
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                Publication number Publication section Publication date Publication page
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                03-07-2017 T_EXA_REQ_TRANS
03-07-2017 T_EXA_MOD_DOSSIER_MILESTONE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             27-06-2017 T_EXA_VALID_BASIC_FEE
27-06-2017 T_EXA_NOTIFICATION
27-06-2017 T_EXA_NOTIFICATION
27-06-2017 T_EXA_MOD_DOSSIER_MILESTONE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        05 - 07 - 2017 T EXA MOD DOSSIER MILESTONE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               No entry for application number EM50000016917536
                                                                                                                                          No entry for application number EM50000016917536
                                                                                                                                                                                                                                   No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                            No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                           No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         No entry for application number EM50000016917536
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         27 - 06 - 2017 T EXA VALID CLASS FEE
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               27 - 06 - 2017 T EXA CLASSIFICATION
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   03-07-2017 TEXA FEES FIN CHECK
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                24 - 06 - 2017 T_EXA_PROV_FIL_DATE
                                                                                                                                                                                                                                                                                                                                                                                            International registration transformation
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            29-06-2017 T_EXA_ABS_GROUNDS
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               28 - 06 - 2017 T_EXA_LANG_CHECK
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     27 - 06 - 2017 T_EXA_COM_SEARCH
03 - 07 - 2017 T_EXA_FORM
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          05 - 07 - 2017 T_EXA_PUBL_A1
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       (530) Event date Event description
E-mail - kamalhajiri@hotmail.com
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      24 - 06 - 2017 T_EXA_KEY_IN
                                                                                                                                                                                (150) Correspondence address
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 2017/125 A.1 2017-07-05 0
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           Frade mark events
                                                                                                                                                                                                                                                                    Exhibition priority
                                                                                                                   (740) Representative
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              Cancellation
                                                                                                                                                                                                              350) Seniority
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              09/07/2017
                                                                                                                                                                                                                                                                                                                                                                                                                           09/07/2017
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      Publication
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                Opposition
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             Recordals
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     Renewals
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        Appeals
                                                                                                                                                                                                                                                                                                                                    Priority
```

RESELLER PROBLEM 2017-07-10 Hajiri_HOME OF

pagina 1 van 9

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO CASE 101662

DOMAINS_cease_and_desist_letter

APPENDIX 14 EMAIL CORRESPONDANCE C&D LETTER NAMESILO

Kamal

Wo 12-7-2017 10:15

AN goldfarb@namesilo.com <goldfarb@namesilo.com>;

Urgentle: Hoog

6 bijlagen (2 MB)

divastash.pdf, APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf; APPENDIX I_https www.whois.com whois APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM50000016917536.pdf,

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: dinsdag 11 juli 2017 20:46

Aan: domain@homeofdomains.com

Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: zondag 9 juli 2017 16:32

Aan: domain@homeofdomains.com; domain@homeofdomains.com; admin@homeofdomains.com Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Weteringkade 22B Kamal Hajiri

2515 AP 's Gravenhage THE NETHERLANDS

kamalhajiri@hotmail.com

Via E-mail and Letter Mail HOME OF DOMAINS

1928 E. Highland Avenue. Ste F104 PMB# 255 Phoenix, AZ 85016

28/08/2017

APPENDIX 01 TO 24

July 10, 2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

pagina 3 van 9

E-mail - kamalhajiri@hotmail.com

Dear Sirs,

cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is STASH*. As such, I write because you are infringing on my trademark and causing me damage by I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith mark. Infringement only for profit purposes and damages the goodwill of the registered mark that intent to profit from another's mark and the domain name is confusingly similar to my registered result in the loss of the rights to the market.

constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also person can be held liable for damages - up to \$100,000 per domain. 15 U.S.C. § 1117(d).

interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the In short, I consider this to be a very serious matter and I will take all necessary and appropriate you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any
 - point in the future; and you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH[®]'

APPENDIX III website infringement 'DIVA STASH®' by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

APPENDIX II website infringement 'DIVA STASH®,

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH®' by namesilo

E-mail - kamalhajiri@hotmail.com

pagina 6 van 9

APPENDIX II website infringement divastash.jpg

E-mail - kamalhajiri@hotmail.com

APPENDIX V EM50000016917536

09/07/2017

Frade mark

DIVA STASH

(210)(260) Application number 016917536

(220) Application date 2017-06-24 (270) Application language nl

Trade mark office EUIPO - EUIPO Second language en

Receiving office number E63398696 Receiving office date 2017-06-24 (199) Registration office EM

(sso) Trade mark type Figurative

(str) Nice classification 18,20,21 (551) Kind of mark Individual

Current trade mark status Application published (531)/(532) Vienna classification 03.13.01 Status date 2017-07-05

Opposition period start date 2017-07-05 Opposition period end date 2017-10-05 (szı) Acquired distinctiveness false

(sto) List of goods and services

APPENDIX II website infringement divastash,jpg

APPENDIX IV EUTM 016917536

(s11) Nice class number 18 09/07/2017

2/4

List of goods and services Reiskoffers en koffers.

List of goods and services Opbergmeubelen; Spiegels. (st1) Nice class number 20

List of goods and services Cosmeticahouders. (s11) Nice class number 21

Applicant identifier 687778 (730)/(731)/(732)/(733) **Owner**

Organization name Kamal Hajiri Name Kamal Hajiri

(842) Applicant legal entity Physical Person Applicant nationality code MA

Applicant incorporation country code NL Address country NL Address country NL

Street Weteringkade 22B City Den Haag

Postcode 2515 AP

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

(740) Representative

```
12-7-2017
```

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

Publication number Publication section Publication date Publication page 27 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE 27 - 06 - 2017 T_EXA_VALID_CLASS_FEE 05 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE 24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE 24 - 06 - 2017 T_EXA_PROV_FIL_DATE 03 - 07 - 2017 T_EXA_REQ_TRANS 03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE No entry for application number EM50000016917536 27 - 06 - 2017 T EXA VALID BASIC FEE 28 - 06 - 2017 T_EXA_LANG_CHECK 27 - 06 - 2017 T_EXA_CLASSIFICATION 03-07-2017 TEXA FEES FIN CHECK International registration transformation 29-06-2017 T_EXA_ABS_GROUNDS 27 - 06 - 2017 T_EXA_NOTIFICATION 27 - 06 - 2017 T_EXA_NOTIFICATION 05-07-2017 T EXA PUBL A1 (sw) Event date Event description (750) Correspondence address 2017/125 A.1 2017-07-05 0 Trade mark events Exhibition priority Cancellation 09/07/2017 09/07/2017 Publication Opposition Recordals Appeals Priority

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO CASE 101662

APPENDIX 15 REGISTERED MAIL C&D LETTER NAMESILO

CEASE & DESIST DEMAND

2515 AP 's Gravenhage THE NETHERLANDS Kamal Hajiri Weteringkade 22B

kamalhajiri@hotmail.com

Via E-mail and Registered Mail

July 17, 2017

1300 E. Missouri Avenue Suite A-110

Phoenix, AZ 85014

Dear Mr. Goldfarb,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark. DIVA STASH.⁹: As such, I write because you are infringing on my trademark and causing me damage by: cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else,

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered mark. Infringement only for profit purposes and damages the goodwill'of the registered mark that result in the loss of the rights to the market. Your registration (and use) and offering for sale of the domain name 'www.alvastash.com' also constitutes eyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act. 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith registers a domain name that is identical or confusingly similar to the trademark of another person eact. be held liable for damages - up to \$100,000 per domain. 15 U.S.C. § 1117(d).

In short, I consider this to be a very serious matter and I will take all necessary and appropriate actions one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be to bring an immediate halt to your blatant and unauthorized use of this trademark. In the interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer you the received no later than July 23, 2017, that:

you have immediately ceased all trademark infringement; and

you agree not to associate 'DIVA STASH" with you or your commercial activities in පම

any way, at any point in the future; and you will immediately transfer your infringing Domain Name to me (iii)

If I do not receive these assurances by the aforesaid dute, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very tridy youps

Kamal Hajiri

APPENDIX III website infringement 'DIVA STASH®' by namesilo APPENDIX I_https www.whois.com whois 'www.divastash.com' APPENDIX II website infringement 'DIVA STASH" APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

1,6

Cease & Desist Demand Hajiri-NAMESILO

28/08/2017

APPENDIX 16 RECEIPT REGISTERED MAIL C&D LETTER NAMESILO

: RN178396065M. : Annettkrnde Brief BTL : 88 9 : 65014 : US Barcode Product Gewicht Aan Bestemming

Net uervoer geschiedt door PostM. onder de verjeden Norwaarden universele frostdienst (Talstsie versie). Deze kunt u vinden op www.mschilni. I kunt uw zending volgen op www.infernationalperce[iracking.com. 114113 17-07-17 15:31 1853526200478600

Tarref: EUR 16.95 Reads pefrankerd: FUR 0 Door u Betaald: EUR 16.95

Development can de de Davie Transfer and [Teresholes een (50 Pe

September Buckey

suoisuetke eromaa, priklool

Diseases (mr-52,005)(0) O 1(5pe.h.prm (35 595 00)

The region of the

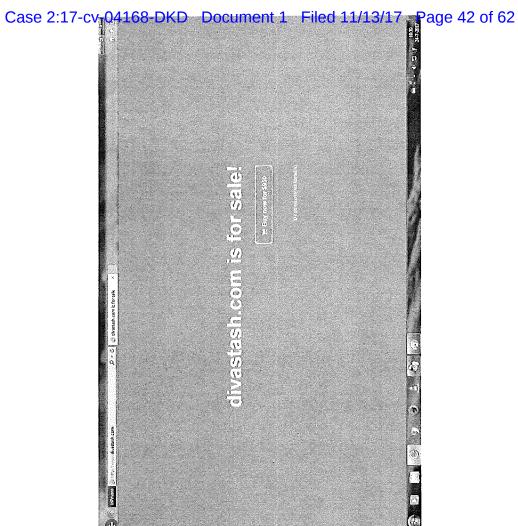
Didn't find what you were looking for?

PR.MOVE 34

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO CASE 101662



APPENDIX 18 website infringement divastash



\$

Taking states

| Afgeleverd | Afg

APPENDIX 19 RECEIPT REGISTER MAIL C&D LETTER NAMESILO RECEIVED

Pakketdetails

Barcode Referentie	RN178396065NL RN178396065NL	Verzenddatum	ma
Ontvanger	85014 Verenigde-Staten		

17 jul, 15:34

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

28/08/2017

APPENDIX 01 TO 24

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

Tracking gebeurtenissen

vr 18 aug za 12 aug dı 18 jul ma 17 jul	Tijd Pla 11:47 20:03 02:21 NL 21:01 NL	Plaats N N	Status Zending is bezorgd Zending in sorfeercentrum buitenland Klaar voor transport naar buitenland Zending is bij PostNL
ma 17 jul	15:34	NL	Zending is bij PostNL Zending wordt verwacht maar zit non niet in sonfeermooss

APPENDIX 20 NAMESILO Reseller Complaint & Policies

APPENDIX 01 TO 24

28/08/2017

pagina 1 van 1

domains, cheap, easy and secure

My Cart | Log In | Create New Account | Manage My Domains

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO

CASE 101662

marketplace transfer

register

home

Why choose NameSilo? pricing why us?

cheap []

APPENDIX 21 website infringement divastash

easy

secure

tools

Support Home :: Policies :: Resolfer Complaints and Policies

Reseller Complaints and Policies

If you have a domain that was registered via one of our resalters, partners, or is, in an account, you do not control, and the account holder is unresponsive, please follow the steps fasted below. Verify that the domain name is registered with NameSilo. You can do this wai a WHOIS search.

- Sand an omail to the receiter and copy us at <u>support@namestiz.com</u>.
- If the reseller does not raply to you within 7.2 haurs, (ensand the original ensal to us at the same ensal address with the addject of "Resellor Problem".
- We will then attempt to condoct the issueler on your betraff. If they do not onely to us, or use unrefling to help insolves the departe, we may work with you to transfer the domain to an account you control.
 - 5. We will reply to you and self-their you quistly an arcsent on our spale and "mall us with the username you substituted with the self-their spale and their spale and their

Other Reseller Topics

- We will not get another in any payment exputes with regallers. You will need to approach any such taxtest precity with the reachter.
- We will not very from the steps lated some. Phase be size to follow the sieps accepts to one in the feature result.
 - We will not incide any changes, to domains taring the process living above. We understant some changes are important to rule; quickly, but we must follow his stock lided about and allow adequate time for the installer to important.
- It your Intermation does not appear in MHCIS than spers is likely not anything we can do to resolve your lessua





Like Bt op Fusetion

Pollow US on Twiller

Home | Register | Transfer | Pricing | Support | Log in | Contact Us | WHOIS All Bjätts Perevand

10-7-2017

28/08/2017

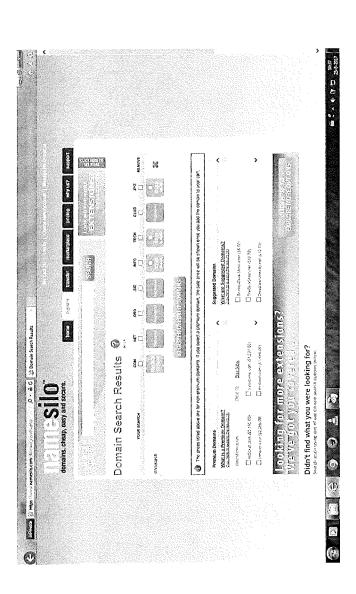
APPENDIX 01 TO 24

https://www.namesilo.com/Support/Reseller-Complaints-and-Policies

APPENDIX 22 website infringement by namesilo

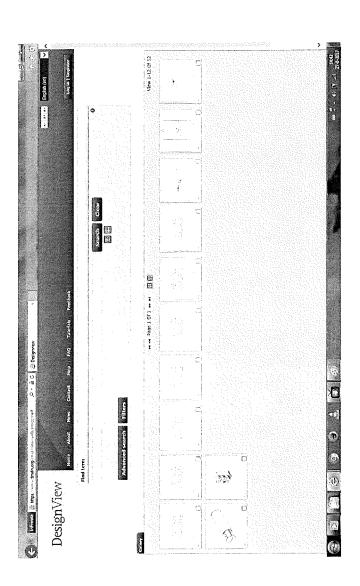


APPENDIX 23 27082017_HAJIRI_EUIPO_dsv-result-list



28/08/2017

APPENDIX 24 27082017_HAJIRI_EUIPO_dsv-result-list



Case 2:17-cv-04168-DKD Document 1 Filed 11/13/17 Page 49 of 62

arritory In the product of the prod		Design office	EM	
Indication of the product Verbal element Application number Design number Registration number Design status Owner name Representative's name Class Filing date Registration date Publication date Expiry sountry Exhibition priority Design office Design status Owner name Previous owner name Previous owner name Previous owner name Class Filing date Registration date Class Filing date Registration date Expiry date Expiry date Class Filing date Registration date Expiry date		Designated territory	LV.LV.LT,GB.HR.RO,HV,BG.FR,BE,DE,DK,FI,IE,CZ,AT,C Y.SE,SI,SK,IT.MT,PL.PT.EM.GR.ES.NL.EE	
Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Publication date Expiny date Expiny date Expiny date Expiny date Expiny date Design office Design office Design status Owner name Previous owner name	And	Indication of the product	undefined	
Application number Design number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Explict date Explict adate Priority date Explict adate Priority date Explict adate Priority date Explict adate Priority country Exhibition priority Design office Design status Owner name Previous owner name	Section of the sectio	Verbal element		
Registration number Designs status Owner name Previous owner name Representative's name Class Filing date Registration date Explict date Priority date Effective date Priority country Exhibition priority Exhibition priority Design office Design attacs Owner name Previous owner name Registration number Design status Owner name Previous owner name Previous owner name Registration number Class Filing date Registration date Class Filing date Registration date Expiry date Expiry date Class Filing date Registration date Expiry date		Application number	003081686 003081898 0001	
Design status Owner name Previous owner name Representative's name Class Filing date Registration date Explity date Friority country Exhibition priority Design office Design attas Owner name Previous owner name Registration number Design rame Designer name Previous owner name Representative's name Class Filing date Registration date Explity date Explication date Explication date Explication date Explication date Explity date Explity date Explication date Explication date Explication date Explity date Explication date Explity date Explication date Explity date Explication number		Registration number	003081686-0001	
Owner name Previous owner name Representative's name Class Filing date Registration date Expiry date Priority country Exhibition priority Design office Design number Registration number Design number Registration number Design rame Designer name Class Filing date Registration date Expiry date		Design status	Registered	C
Previous owner name Representative's name Designer name Class Filing date Registration date Expiry date Priority country Exhibition priority Exhibition priority Design office Design number Registration number Design number Registration number Design rame Previous owner name Representative's name Designer name Class Filing date Expiry number		Owner name	HAJIRI	as
Representative's name Class Filing date Registration date Publication date Explicy date Explicy date Effective date Priority date Effective date Priority country Exhibition priority Exhibition priority Design office Design at the product Verbal element Application number Registration number Design status Owner name Previous owner name Previous owner name Representative's name Designer name Class Filing date Registration date Class Filing date Explicy date		Previous owner name	,	C
Class Filing date Registration date Publication date Expiry date Priority country Exhibition priority Design office Design office Design number Registration number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Representative's name Class Filing date Registration date Expiry date		Representative's name		۷.
Classs Filing date Registration date Publication date Expiry date Expiry date Effective date Priority date Effective date Priority country Exhibition priority Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design rame Previous owner name Previous owner name Previous owner name Class Filing date Registration date Expiry date Expiry date Expiry date Expiry date Expiry date End of defement		Designer name		1
Registration date Publication date Expiry date Expiry date Effective date Priority date End of deferment Priority country Exhibition priority Exhibition priority Exhibition priority Design office Design at the product Verbal element Application number Design number Clessign status Owner name Previous owner name Previous owner name Previous owner name Class Filing date Registration date Class Filing date Expiry pumber		Class		<i>i</i> - 0
Publication date Explication date Explication date Explication date Exhibition priority Exhibition priority Exhibition priority Design office Design at the product Verbal element Application number Registration number Registration number Registration number Class Filing date Representative's name Previous owner name Previous		Time deale	22-04-2018	٧ر
Expiny date Effective date Priority date End of deferment Priority ountry Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Registration number Registration number Registration number Class Filing date Representative's name Previous owner name Previous owner name Previous owner name Previous date Class Filing date Expiry date Effective date Priority date Effective date Priority date Effective date Priority date End of deferment Priority country		Registration date	22-04-2016 10-05-2016	-0
Effective date Priority date End of deferment Priority number Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Registration number Design status Owner name Previous owner name Class Filing date Registration date Expiry date Effective date Priority date Effective date Priority date Effective date Priority date End of deferment Priority country		Expiry date	5102-00-01	4.
Priority date End of defement Priority number Priority number Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Presign status Owner name Registration number Design status Owner name Previous owner name Representative's name Designer name Representative's name Class Filling date Registration date Expir date Expir date Expir date Publication date Expir date Expir date Priority date Expir date Priority date End of defement		Effective date		LU
End of deferment Priority number Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Representative's name Previous owner name Representative's name Class Filing date Registration date Designer name Class Filing date Exply date Explore date Priority date End of defement		Priority date		0.
Priority number Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Representative's name Class Filling date Registration date Expliy country		End of deferment		-
Design office Design office Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design number Design status Owner name Previous owner name Previous owner name Representative's name Designer name Class Filing date Class Filing date Expiry date Expiry date Expiry date Expiry date Expiry date Expiry date Effective date Priority date End of defement		Driority or Imphor		יוכ
Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Registration number Registration number Registration number Registration number Class Filing date Registration date Designer name Class Filing date Expiry date Expiry date Effective date Priority date Effective date Priority date End of defement		Friority number		\L
Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Registration number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Designer name Class Filing date Expliy date		Priority country		_
Design office Designated territory Indication of the product Verbal element Application number Design number Begistration number Design status Owner name Previous owner name Previous owner name Representative's name Designer name Class Filling date Registration date Expiry country		Exhibition priority		
Designated territory Indication of the product Verbal element Application number Design number Registration number Registration number Design status Owner name Previous owner name Representative's name Designer name Representative's name Class Filing date Registration date Publication date Publication date Expiry date Expiry date Expiry date Expiry date Expiry date Expiry date Effective date Priority date Fired of defement		Design office	EM	סכ
Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Representative's name Class Filling date Class Filling date Expiry date Firective date Priority number		Designated territony	17.11.1 T OB UP DO HILL BY BE DE	,,
Indication of the product Verbal element Application number Design number Design status Owner name Previous owner name Previous owner name Previous owner name Class Filing date Class Filing date Expiry date Friective date Priority date Priority country		Designated termory	LV,LO,L', GB, HK, KO, HO, BG, FK, BE, DE, UK, FI, IE, CZ, A I, C Y, SE, SI, SK, IT, MT, PL, PT, EM, GR, ES, NL, EE	,ui
Verbal element Application number Besign number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Publication date Expiry date Expiry date Effective date Priority date Effective date Priority date Priority date Priority number		Indication of the product	undefined	111
Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Class Filing date Registration date Projicy date Expliy date Expliy date Expliy date Effective date Priority date End of deferment Priority number	1 15	Verbal element		U
Design number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Expiny date Expiny date Effective date Priority date End of deferment Priority number		Application number	003491778	щ
ration number status rame us owner name sentative's name er name er name ation date ation date ation date for date ve date ve date referment rumber		Design number	003491778-0001	+
n status rname us owner name sentative's name ner name atte tration date ation date date ve date r date r deferment r number		Registration number	003491778-0001	
name us owner name sentative's name her name tate tration date ation date date ve date r date r deferment r number		Design status	Registered	
us owner name sentative's name her name date ation date ation date date ve date r date r deferment r number		Owner name	HAJIRI	
sentative's name her name date ation date ation date date ve date r deferment r number		Previous owner name		u
ner name date ration date ation date date date / date / date / number / country		Representative's name		Τ.
date ration date ation date date ve date r deferment r number		Designer name		L/
date date date te ment ment ober		Class	1	
date date te t		Filing date	30-11-2016	ב זיי
date te mment mber ntry		Registration date	30-11-2016	L /
Expiry date - Effective date - Priority date - End of deferment - Priority number -		Publication date	27-12-2016	
Effective date - Priority date - End of deferment - Priority number - Priority country -		Expiry date	•	г
Priority date - End of deferment - Priority number - Priority country -		Effective date		αį
End of deferment - Priority number - Priority country -		Priority date		jе
Priority number - Priority -		End of deferment		- 4
Priority country -		Priority number		19
2 · 32-1		Priority country		0
Exhibition priority -		Exhibition priority	1	

Find term anm:hajiri		
	Design office	EM
	Designated territory	LV.LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,FI,DK,IE,CZ,AT,C
	Indirection of the conjust	1,0E,01,0N,11,M1,7L,7 1,EM,GR,E0,ML,EE
	Verbal element	חומפווופת
	Application number	002778985
	Design number	002778985-0001
	Registration number	002778985-0001
	Design status	Registered
	Owner name	HAJIRI
	Previous owner name	
	Representative's pame	, ,
	Designation named	
	Designer name	•
	i cass	1 (
	Filing date	24-09-2015
	Registration date	24-09-2015
	Publication date	07-10-2015
	Expiry date	•
	Effective date	
	Priority date	1
	End of deference	
	End of deferment	•
	Priority number	1
	Priority country	•
	Exhibition priority	
	Design office	EM
	Designated territory	LVLULT GB HR RO HU BG ER RE DE DK EI IE CZ AT C.
		Y,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	Indication of the product	nndefined
	Verbal element	í
	Application number	002955963
	Design number	002955963-0001
	Registration number	002955963-0001
	Design status	Registered
	Owner name	HAJIRI
	Previous owner name	
	Representative's name	
	Designer name	•
	Class	
	Filing date	73-01-2016
	Registration date	23-01-2046
	Publication data	27.07.20
	Fynin, date	01-22-20-50
	Effective date	
	Priority date	
	End of deferment	
	Priority number	,
	Priority country	
	Exhibition priority	

Case 2:17-cv-04168-DKD Document 1 Filed 11/13/17 Page 50 of 62

Design office EM			
Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Representative's name Designer name Class Filing date Expliy date Effective date Priority number Priority country Exhibition priority Exhibition priority Design office Design attals Owner name Registration of the product Verbal element Application of the product Verbal element Application number Design number Registration number Registration number Design status Owner name Previous owner name Previous owner name Class Filing date Explix date Explix date Explix date Design status Owner name Previous owner name Previous owner name Previous owner name Previous date Design status Owner name Previous date Priority date Explix date Explix date Explix date Priority number Priority number Priority number		Design office	EM
Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filling date Exploying country Exhibition priority Design office Design office Design attent Verbal element Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Class Filling date Registration date Expiry wumber Priority number Priority pumber Priority pumber		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,C Y,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filling date Expliny date Expliny date Effective date Priority number Priority country Exhibition priority Design office Design office Design office Design status Owner name Previous owner name Registration number Design status Owner name Previous owner name Class Filling date Registration date Previous owner name		Indication of the product	undefined
Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filling date Expiny date Expiny date Expiny date Priority date Priority country Exhibition priority Design office Design office Design office Design status Owner name Previous owner name Class Filling date Registration date Previous owner name		Verbal element	•
Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Expiny date Effective date Priority number Priority country Exhibition priority Exhibition priority Design office Design office Design office Design status Owner name Previous owner name Odesign status Owner name Previous owner name		Application number	003866219
ration number status reame us owner name sentative's name er name ation date date date date deferment roumber roffice on of the product element ation number ration number date us owner name us owner name ve date date date date date date feferment y date ve date y date		Design number	003866219-0001
rame us owner name sentative's name eer name ser rame tate ration date date date date deferment r number r office element ation of the product element ation of the product element noffice ration number r status r name us owner name sentative's name her name date tradion date date date date date date f deferment date ve date y date y date ve date y date		Registration number	003866219-0001
riame us owner name eer name eer name eer name eer name date date ve date / date / country frountry fr		Design status	Registered
us owner name sentative's name ler name ler name late tate tation date date date date / date / date / country gion priority gion of the product element noffice nated territory gion of the product element nomber number		Owner name	HAJIRI
sentative's name let name tate ration date ation date date ve date / date / date / date / date / country tion priority tion priority tion of the product lelement ation number number number number number number number number ation number number number ation number number ation number ation number number on tattus reate telement ation date date felement date ve date y date y date y date y date y date y number		Previous owner name	1
tate ration date ation date date date ve date / country ition priority ition priority ition of the product relement ation number number ration number ration number ration number ration date ation date ation date ation date ation date ation date y date ration date y date ve date y date		Representative's name	ı
tate ation date ation date date ve product ve pr		Designer name	
ory arme hame		Class	
ory product ame name		Filing date	21-04-2017
ory product er name		Registration date	21-04-2017
ory product er er hame		Publication date	08-05-2017
ory social and		Expiry date	
ory social and		Effective date	
ory product er ber name		Priority date	
11		End of deferment	
11		Priority number	
11		Priority country	ı
		Exhibition priority	
		80 1100	>0
		and in the second	\d
		Designated territory	LU,NI,BE
nber mber mber s name s name te	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Indication of the product	Behuizingen voor handspiegeltjes
ation number number ration number ration number status ratus rame us owner name us owner name ter name ter name tation date date date date to date to fatte		Verbal element	
n number ration number status roame us owner name us owner name sentative's name ter name ration date ation date date ve date ve date /) }	Application number	•
ration number status reame us owner name sentative's name ter name ration date date date date date f defement f number f country tion priority		Design number	8656001
n status name us owner name sentative's name ter name tate ation date date date date t deferment number number v country tion priority		Registration number	86560-0001
name us owner name sentative's name ter name tate ration date date date (date t deferment t number t country tion priority		Design status	Registered and fully published
us owner name sentative's name ler name ler name late ration date ation date date ve date ve date ve fate ve namber v number vountry tion priority		Owner name	Kamal Hajiri
sentative's name ler name late ation date ation date date date ve date felement number country		Previous owner name	1
ter name tate ration date ation date date ve date referement runnber rountry		Representative's name	
Jate ration date ation date date ve date / date / date / number / number		Designer name	ŧ
n date date date ate ate sment nber nntry		Class	03.01
		Filing date	•
		Registration date	01-07-2016
Expiry date - Effective date - Priority date - End of deferment - Priority number - Priority country - Exhibition priority -		Publication date	01-07-2016
Effective date - Priority date - End of deferment - Priority number - Priority country - Exhibition priority -		Expiry date	ı
Priority date - End of deferment - Priority number - Priority country - Exhibition priority -		Effective date	
End of deferment - Priority number - Priority country - Exhibition priority -		Priority date	•
Priority number - Priority country - Exhibition priority -		End of deferment	r
Priority country - Exhibition priority -		Priority number	•
Exhibition priority -		Priority country	•
		Exhibition phonity	

Design office EM			
Indication of the product verbal element Application number Design status Owner name Previous owner name Previous owner name Previous owner name Class Filing date Registration date Expiry date Effective date Priority date End of deferment Priority value End of deferment Priority number Priority value End of deferment Priority country Exhibition priority Country Exhibition priority and Design status Owner name Previous owner name Previous owner name Previous owner name Previous owner name Design status Owner name Previous owner name Previous date Effective date Provinty number Design status Owner name Design status Owner name Design status Owner name Effective date Provinty date Effective date Priority number Priority num		Design office	EM
Indication of the product Verbal element Application number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Exply date Exply date Exply date Exply date End of deferment Priority number Priority date End of deferment Priority date End of deferment Priority number Priority country Exhibition priority Design office Design status Owner name Registration number Class Filing date Previous owner name Representative's name Designer name Class Filing date Proirity date Expiry date Expiry date Expiry date Expiry date Priority number Expiry date		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,C Y,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
Verbal element Application number Design number Registration number Design status Owner name Representative's name Class Filing date Filing date Expliv date Explority number Priority date End of deferment Priority number Priority date End of deferment Priority number Priority number Priority atte End of deferment Application number Design status Owner name Registration date Previous owner name Class Filing date Representative's name Design status Owner name Previous owner name Registration date Previous date Previous date Previous date Proirity date Expiry date Expiry date Expiry date Expiry date End of deferment Priority number Priority date Extention priority		Indication of the product	undefined
Application number Design number Registration number Design status Owner name Representative's name Class Filing date Registration date Explicative date Priority date Explicative date Priority country Exhibition priority Design office Design status Owner name Registration number Design status Owner name Registration number Design status Owner name Registration date Previous owner name Class Filing date Representative's name Design status Owner name Design status Owner name Previous owner name Class Filing date Representative's name Design status Owner name Design status Owner name Previous owner name Design status		Verbal element	t
Registration number Registration number Previous owner name Previous owner name Previous owner name Representative's name Class Filing date Registration date Exply date Effective date Priority date Effective date Priority number Priority number Priority number Priority number Priority country Exhibition priority country Exhibition priority country Exhibition of the product Verbal element Application number Design status Owner name Previous owner name Previous owner name Previous owner name Previous owner name Class Filing date Registration date Publication date Effective date Priority date Effective date Priority number Priority Exhibition priority		Application number	003528959
Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Expliy date Effective date Priority date Effective date Priority country Exhibition priority Exhibition priority Design office Design office Design office Design number Registration number Class Filing date Registration date Previous owner name Representative's name Class Filing date Registration date Previous date Previous date Registration date Previous date Expiry date		Design number	003528959-0001
Design status Owner name Previous owner name Representative's name Designer name Class Filling date Registration date Expliy date Effective date Priority date Effective date Priority country Exhibition priority Exhibition priority Design office Design office Design office Design status Owner name Registration number Design number Begistration number Class Filling date Registration date Previous owner name Representative's name Class Filling date Registration date Previous date Proirity date Expiry date Ex		Registration number	003528959-0001
Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Expiry date Expiry date End of deferment Priority number Priority country Exhibition priority Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design status Owner name Registration number Registration number Class Filing date Registration date Previous owner name Representative's name Class Filing date Registration date Proirity date Expiry date		Design status	Registered
Previous owner name Representative's name Class Filing date Registration date Publication date Expliy date Expliy date End of deferment Priority ourntry Exhibition priority Exhibition priority Design office Design status Owner name Registration number Registration date Previous owner name Registration date Previous owner name Registration date Previous owner name Registration date Previous date Expiry date		Owner name	HAJIRI
Representative's name Designer name Class Filing date Registration date Publication date Exply date Effective date Priority date End of deferment Priority number Priority country Exhibition priority Design office Design status Owner name Previous date Effective date Priority date Effective date Priority number Priority number Priority number Priority number		Previous owner name	
Class Filing date Registration date Publication date Exply date Effective date Priority date End of deferment Priority number Priority number Priority country Exhibition priority Design office Design atte element Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Previous owner name Class Filing date Representative's name Design status Owner name Previous date Effective date Priority date Effective date Priority number Priority number Priority number Priority number		Representative's name	•
Class Filing date Registration date Explication date Explication date Explication date Explication date Explication date End of deferment Priority date Priority country Exhibition priority Design office Design office Design at the product Verbal element Application number Design number Cowner name Previous owner name Previous owner name Previous owner name Previous owner name Class Filing date Registration date Prointy date Effective date Priority date Effective date Priority date Effective date Priority date End of deferment Priority number		Designer name	1
Filing date Registration date Publication date Expliy date Effective date Priority date Effective date Priority country Priority country Exhibition priority Exhibition priority Design office Design office Design number Registration number Design number Registration number Besign status Owner name Previous owner name Registration date Class Filing date Registration date Previous date Registration date Previous date Expiry date		Class	•
Registration date Publication date Expiry date Effective date Priority date Effective date Priority country Exhibition priority Design office Design office Design office Design office Design office Design office Design number Registration number Design status Owner name Previous owner name Previous owner name Registration date Designer name Representative's name Class Filing date Registration date Previous date Expiry date		Filing date	20-12-2016
Publication date Expiry date Expiry date End of deferment Priority country End of deferment Priority country End of deferment Priority country Explibition priority Design office Design office Design atter Verbal element Application number Design number Registration number Besign rame Previous owner name Registration date Previous owner name Representative's name Class Filing date Registration date Previous date Proirity date Expiry and element Priority date Priority number Priority country Exhibition priority		Registration date	20-12-2016
Expiry date Effective date Priority date End of deferment Priority number Priority country End of deferment Design office Designated territory Indication of the product Verbal element Application number Design status Owner name Registration number Registration number Class Filing date Registration date Previous owner name Representative's name Class Filing date Registration date Previous date Proirity date Expiry ate Priority country Exhibition priority		Publication date	11-01-2017
Effective date Priority date End of deferment Priority country Exhibition priority Design office Design office Designated territory Indication of the product Verbal element Application number Design status Owner name Previous owner name Class Filing date Previous date Expiry adate Expiry date Expiry adate Expi		Expiry date	•
Priority date End of deferment Priority number Priority country Exhibition priority Design office Design ated territory Indication of the product Verbal element Application number Design number Registration number Registration number Previous owner name Previous owner name Previous owner name Previous owner name Representative's name Class Filing date Registration date Publication date Publication date Proirity date Expiry ate		Effective date	ı
End of defement Priority number Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Registration date Class Filing date Registration date Publication date Publication date Publication date Priority date Effective date Priority ournber Priority number Priority number Priority number Priority number Priority number Priority number		Priority date	r
Priority number Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design status Owner name Previous owner name Previous owner name Representative's name Designer name Representative's name Designer name Representative's name Designer name Representative's name Designer name Class Filling date Registration date Class Filling date Registration date Publication date Effective date Publication date Exhibition priority Exhibition priority		End of deferment	•
Priority country Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Registration number Design status Owner name Previous owner name Representative's name Designer name Representative's name Class Filling date Registration date Class Filling date Registration date Expiry date Ex		Priority number	•
Exhibition priority Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Registration number Design status Owner name Previous owner name Previous owner name Representative's name Designer name Class Filling date Registration date Class Filling date Registration date Expiry da		Priority country	ī
Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Publication date Expiry date Expiry date Expiry date Expiry date Expiry date Expiry date End of defement Priority date Priority number Priority country Exhibition priority		Exhibition priority	•
Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Representative's name Designer name Representative's name Class Filling date Registration date Publication date Effective date Expiry date Effective date Priority date Find of deferment Priority number Priority country Exhibition priority		Design office	Z
Designated temtory Indication of the product Verbal element Application number Besign number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Expiry ate End of deferment Priority number Priority country Exhibition priority		3	
Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Expiry date Expiry date Expiry date Expiry date End of defement Priority date Priority number Priority country Exhibition priority	-	Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,C Y,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
Verbal element Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Class Filing date Registration date Publication date Expiry date Expiry date Expiry date Expiry date Expiry date Expiry date Find of defement Priority number Priority country Exhibition priority		Indication of the product	undefined
Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Class Filing date Registration date Publication date Expiry date Expiry date Expiry date Expiry date End of defement Priority uumber Priority country Exhibition priority		Verbal element	1
Design number Registration number Design status Owner name Previous owner name Representative's name Class Filing date Registration date Publication date Effective date Priority date Friority date Friority date Friority cate Friority country Exhibition priority		Application number	003866219
ation number status name us owner name sentative's name ter name tate ation date add atte ve date ve date ve date ve country tion priority		Design number	003866219-0002
n status name us owner name sentative's name her name tate ation date add ate date fedement number rountry ion priority		Registration number	003866219-0002
name us owner name sentative's name ter name tate ation date add ate date felement felement forumber forunty		Design status	Registered
us owner name sentative's name her name tate tate ation date date date / date / date / number / country		Owner name	HAJIRI
sentative's name ler name tate ration date ation date date ve date ve date ve date ve cate ve namber ve number ve number ve number		Previous owner name	•
ter name tate ration date ation date date ve date ve date verdere deferment r number vountry		Representative's name	
tate ration date ation date date ve date (deferment runnber country	····	Designer name	•
n date date date t ate are arment nber untry		Class	•
		Filing date	21-04-2017
		Registration date	21-04-2017
		Publication date	08-05-2017
7		Expiry date	•
7		Effective date	•
	-	Priority date	1
		End of deferment	
Priority Exhibition priority		Priority number	•
Exhibition priority -		Priority country	·
		Exhibition priority	

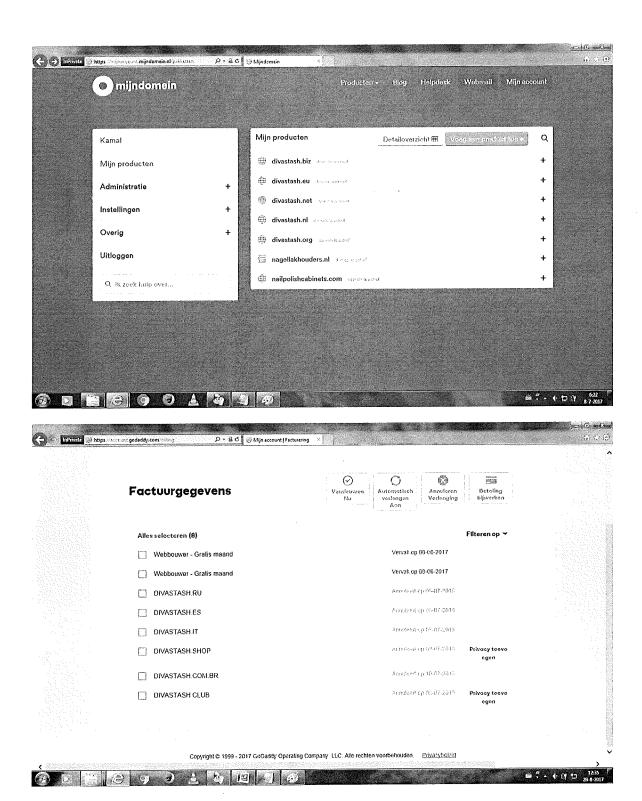
Case 2:17-cv-04168-DKD Document 1 Filed 11/13/17 Page 51 of 62

	Design office	BX
	Designated ferritory	
\	Indication of the product	Nagellakhoudere
\	Methol plomont	
	vercel element	•
	Application number	•
	Design number	3973200
)	Registration number	39732-0000
	Design status	Registered and fully published
	Owner name	Kamal Hajiri
	Previous owner name	,
	Representative's name	•
	Designer name	•
	Sel	09 01 28 02
	Filing date	
	District Control	
	Registration date	04-04-20 4
	Publication date	21-05-2014
	Expiry date	
	Effective date	í
	Priority date	
	End of deferment	
	Priority number	1
	Friority country	•
	Exhibition priority	
	Design office	BX
	Designated territory	
	1	
	Indication of the product	Samengesteld meubilair
	Verbal element	
1	Application number	
7	Design number	8662101
	Registration number	86621-0001
	Design status	Registered and fully published
	Owner name	Kamal Hajiri
	Previous owner name	•
	Representative's name	
	Designer name	•
	Class	06.05
	Filing date	•
	Registration date	22-08-2016
٠	Publication date	01-12-2016
	Expiry date	
	Effective date	
	Priority date	
	End of deferment	i
	Priority number	•
	Priority country	
	Exhibition priority	
this contract the second secon	Supplied House	a en er er en men menne et lan hickelski anterne hamhader ud unkreunde men met en men de men den en et an en m

tony product name s name s name s name nber nt nt nt nt name s name s name nher nher nher nher nher nher nher nhe			
Designated territory Indication of the product Verbal element Application number Design status Owner name Representative's name Class Filling date Class Filling date Expiry date Effective date Priority country Exhibition priority Exhibition priority Exhibition priority Design number Priority country Priority country Exhibition priority Design number Priority country Priority country Priority country Country Design status Owner name Previous owner name Design status Owner name Previous owner name Design status Owner name Design status Class Filling date Registration date Expiry date Effective date Previous owner name Design status Owner name Design status Owner name Design status Design status		Design office	W.
Indication of the product Verbal element Application number Design number Registration number Design status Owner name Representative's name Class Filling date Priority date Expliy date End of deferment Priority number Priority date End of deferment Priority date End of deferment Priority number Priority number Priority number Priority country Exhibition priority Design office Design status Owner name Previous owner name Previous owner name Previous owner name Class Filling date Registration date Previous owner name Class Filling date Registration date Previous owner name Class Filling date Effective date Priority number Priority country Class Filling date		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,C Y,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NI,,EE
Application number Design number Registration number Registration number Owner name Previous owner name Previous owner name Representative's name Class Filling date End of deferment Priority number Class Filling date Exhibition priority Cowner name Registration number Designs status Owner name Registration date Class Filling date Registration date Designs tratus Owner name Registration date Previous owner name Registration date Expliy date		Indication of the product	Composite storage furniture
Application number Design number Registration number Design status Owner name Previous owner name Previous owner name Class Filing date Effective date Priority country Emblishion priority Exhibition priority Design number Design office Design number Design status Owner name Previous owner name Previous owner name Previous owner name Previous owner name Class Filing date Besign status Owner name Previous owner name Previous owner name Class Filing date Explication date Besign status Class Filing date Besign status Class Filing date Fredious owner name Previous owner name Class Filing date Fi		Verbal element	
Registration number Registration number Owner name Previous owner name Class Filling date Class Filling date Expiry date Effective date Priority outry Exhibition priority Exhibition priority Design number Priority courty Exhibition priority Exhibition priority Design number Priority courty Exhibition priority Courty Design rumber Presentative's name Design rumber Class Filling date Registration number Class Filling date Registration date Previous owner name Design rumber Class Filling date Frective date Priority date Effective date Priority number	(Application number	002672824
Registration number of Owner name Previous owner name Previous owner name Previous owner name Class Filling date Class Filling date Publication date Priority date Expliy date Effective date Priority country Enhibition priority Exhibition date President Priority date Effective date Expliy date Effective date Priority founter Priority founter Priority number Priority counter New Priority number Priority number Priority number Priority date		Design number	002672824-0001
Design status Owner name Previous owner name Previous owner name Class Filing date Publication date Publication date Publication date Expiry date Effective date Priority date Effective date Priority country Exhibition priority Designated territory Indication of the product Verbal element Application number Design status Owner name Previous owner name Representative's name Designer name Class Filling date Effective date Priority number Priority vountry)	Registration number	002672824-0001
us owner name us owner name eentative's name ler name let name late date date date date clefement r number r country tion priority tion priority tion priority tion priority tion priority lelement addon number n number n number n status r name us owner name sentative's name ner name date tration date date date date date date v date v date v g date v g date v country	A. 75m3. V	Design status	Registered
us owner name sentative's name ler name let name late date date ve date / date / date / date / date / number / number / norffice lement adon number lelement adon number northine northine northine northine northine northine northine northine northine lelement adon number latent adon number northine northine northine northine northine northine northine northine latent name late		Owner name	HAJIRI
sentative's name let name date date ation date date date date deferment for number for n		Previous owner name	ı
late ration date date date date date date date date		Representative's name	r
ate ration date ston date date date date date date deferment date deferment a country iton priority iton of the product lelement atton number nortatus r name us owner name us owner name us owner name date fration date date date date date date date date		Designer name	Kamal Hajiri
ation date date date date date ve date ration date date ration date ration priority dion priority dion of the product delement ation number n number n number n number n number n status r name us owner name sentative's name ner name date tration date date ration date ration date ration date date ration date ration date ration date		Class	06.05
tr t tory lory lory lory lory lory lory lory l		Filing date	31-03-2015
t t t t t t t t t t t t t t t t t t t		Registration date	31-03-2015
t t t t t t t t t t t t t t t t t t t		Publication date	13-01-2016
orth with the control of the control		Expiry date	31-03-2020
ent straight of the product of the p		Effective date	
		Priority date	•
		End of deferment	•
		Priority number	
		ionini filini	
		Priority country	•
		Exhibition priority	
	and difference difference abundance and committee in the committee of the	Design office	RX
			L
	Ź V	Designated territory	LO,NL,BE
mber character c		Indication of the product	Flacons voor nagellak
ation number artion number artion number artion number a status name asentative's name her name ation date ation date date we date a da		Verbal element	ı
ration number status roame us owner name us owner name er name er rame ration date date date ve date r date r defement r onnmber	Ì	Application number	
status I status I status I name I sentative's name sentative's name let name ation date date date date date date date detement defemment f number		Design number	8627101
n status name us owner name sentative's name er name ration date ation date date ve date redefement redefement		Registration number	86271-0001
us owner name us owner name sentative's name ter name late ation date ation date date date ve date referment		Design status	Registered and fully published
us owner name sentative's name ter name late ration date ation date date ve date r date r deferment		Owner name	Kamal Hajiri
sentative's name ler name late ration date ation date date ve date r date referment		Previous owner name	•
ter name tate tation date ation date date ve date r date r deferment		Representative's name	
tate ation date ation date date ve date r date r deferment		Designer name	
Jate ration date ation date date ve date / date deferment		936	09 01 09 03
		Class	
		riing date	
#		Registration date	14-01-2016
Expliy date Effective date Priority date End of deferment Priority number Priority country		Publication date	14-01-2016
Effective date Priority date End of deferment Priority number Priority number		Expiry date	•
Priority date - End of deferment - Priority number -		Effective date	
End of deferment Priority number Priority country		Priority date	•
Priority number - Priority cumtry		End of deferment	1
Priority country -		Priority number	
fairson fried i		Priority country	
Exhibition priority -		Exhibition priority	•

UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

APPENDIX 25 OTHER WEBSITES DIVASTASH REGISTERED



UDRP ADR KAMAL HAJIRI COMPLAINANT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662

APPENDIX 26 DIVASTASH SOCIAL MEDIA

- facebook
- google, youtube
- instagram
- mail, hotmail, live
- pinterest
- twitter
- reddit
- tumblr
- vk
- pinterest
- flickr
- yahoo

UDRP ADR KAMAL HAJIRI COMPLAINT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662 AMEND COMPLAINT

Kamal Hajiri Weteringkade 22B 2515 AP's Gravenhage THE NETHERLANDS kamalhajiri@hotmail.com

September 01, 2017

Czech Arbitration Court To: Mrs. Angelica Lodigiani Vladislavova 17, 110 00 Prague 1 Czech Republic

Dear Sir/Madam,

I am Kamal Hajiri, owner of several registered patents (EUIPO and USPTO), copyrights and the trademark 'DIVA STASH®'. As such, I like to start a UDRP procedure because of trademark infringement on disputed domain name 'www.divastash.com' by 'HOME OF DOMAINS' and 'NAMESILO.COM' which causes me damage.

- 1) The domain name is identical or confusingly similar to a trademark in which the complainant has rights. The complainant is owner of the EUTM 'divastash' registered on 24/06/2017 under number 016917536 for containers for cosmetics, trunks and suitcases, cupboards and mirrors in Nice classes 18, 20 and 21.
- 2) The Respondent has no rights or legitimate interest in respect of the domain name. To the best of complaint's knowledge, no person or entity anywhere in the world, other than the complainant, has the legal right to use the term 'divastash'. The word 'divastash' is an invented word. It does not appear in any dictionary and therefore, the word 'divastash' is to be considered dominant and distinctive.
- 3) The domain name is registered and is being used in bad faith. The respondent has no connection or affiliation of any kind in the specific market. The term 'divastash' has never been used for websites, trademarks or any commercial activity and therefore not known by the public until EUTM-office published the application on 05th July 2017. These circumstances indicating internet fraud, cybersquatting and preventing the owner of the trademark from reflecting the mark in a corresponding domain name. Respondents' bad faith is also evidenced by offering the website for sale, which also constitutes trademark and copyright infringement.

The complainant sent the respondent several warning letters by email and registered mail started on 09 July 2017 to stop the infringing use of the disputed domain name immediately. Up until now, these letters remained unanswered. Copy of the warning letters and printscreens of the disputed website as well as results of the EUIPO and EUTM database of TM number 016917536 and relevant documents have been attached to the complaint as an annex (appendix 01 – 26).

I, Kamal Hajiri started this project in 2013 to find the best solutions for women to store their nail polish and make up in a practical and stylish way. Different in this engineering-project is that time and money are subordinate to find the best solution of makeup storage. With the registration of all designs and trademark at the EUIPO the investment must be recouped. For marketing purposes it is of utmost importance that the disputed domain name 'www.divastash.com' to be transferred to the owner of the trademark.

01/09/2017 1/2

UDRP ADR KAMAL HAJIRI COMPLAINT <u>WWW.DIVASTASH.COM/HOME</u> OF DOMAINS - NAMESILO CASE 101662 AMEND COMPLAINT

Also the inaccessibility of the CEO Mr. Goldfarb, the support desk of namesilo.com and Home of Domains makes it very bad. As a company they should know how it feels getting robbed like this.

All the above leads to the conclusion that the respondent has registered and is using the disputed domain name in bad faith.

I hope to have you informed enough to make a decision in this case.

Best Regards,

Kamal Hajiri

APPENDIX 01	PROGRESS PROCEDURE
APPENDIX 02	EMAIL CORRESPONDANCE C&D LETTER HOD
APPENDIX 03	WHOIS https www.whois.com whois divastash
APPENDIX 04	website infringement divastash
APPENDIX 05	website infringement by namesilo
APPENDIX 06	EUTM 016917536
APPENDIX 07	EM50000016917536
APPENDIX 08	REPLY HOD ON C&D LETTER 07-10-2017
APPENDIX 09	EMAIL CORRESPONDANCE NAMESILO REPORT ABUSE
APPENDIX 10	EMAIL CORRESPONDANCE NAMESILO 01
APPENDIX 11	EMAIL CORRESPONDANCE NAMESILO 02
APPENDIX 12	CHAT namesilo
APPENDIX 13	EMAIL CORRESPONDANCE C&D LETTER HOD
APPENDIX 14	EMAIL CORRESPONDANCE C&D LETTER NAMESILO
APPENDIX 15	REGISTERED MAIL C&D LETTER NAMESILO
APPENDIX 16	RECEIPT REGISTERED MAIL C&D LETTER NAMESILO
APPENDIX 17	website infringement by namesilo
APPENDIX 18	website infringement divastash
APPENDIX 19	RECEIPT REGISTER MAIL C&D LETTER NAMESILO RECEIVED
APPENDIX 20	NAMESILO Reseller Complaint & Policies
APPENDIX 21	website infringement divastash
APPENDIX 22	website infringement by namesilo
APPENDIX 23	27082017_HAJIRI_EUIPO_dsv-result-list
APPENDIX 24	27082017_HAJIRI_EUIPO_dsv-result-list
APPENDIX 25	websites registration divastash
ADDENIDIX 26	social media registration divastash

On-line ADR Center of the Czech Arbitration Court (CAC)

Panel Decision

§ 15 of the UDRP Rules (Rules), § 9 of the CAC's Supplemental Rules (Supplemental Rules)

Case No.

101662

Time of Filing

2017-08-30 14:24:16

Disputed domain name

DIVASTASH.COM

Case Administrator

Name

Aneta Jelenová

Complainant

Name

KAMAL HAJIRI

Address

Weteringkade 22B

City, State (if applicable)

Den Haag

Country

Netherlands

ZIP/Postal Code

2515 AP

E-mail

kamalhajiri@hotmail.com

Telephone

+31630289573

Fax

Respondent

Organization

HOME OF DOMAINS

Address

1928 E. Highland Ave. Ste F104 PMB# 255

City, State (if applicable)

PHOENIX

Country

United States

ZIP/Postal Code

AZ 85016

E-mail

domain@homeofdomains.com

Telephone

+13478717726

Fax

Other Legal Proceedings

None.

Identification of rights

APP. 28

EU trademark no. 016917536: figurative mark comprising a butterfly image and the words DIVA STASH in classes 18, 20, 21; application date 24 June 2017, publication date 5 July 2017, registration date 12 October 2017.

Factual Background

The Respondent registered the disputed domain name on 24 June 2017 and has offered it for sale for \$950. The Respondent has not otherwise used the disputed domain name or any corresponding name.

No response has been filed.

Rights

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i)of the Policy), although the Complainant only acquired such rights when its trademark application was granted on 12 October 2017, subsequent to the filing of the Complaint and the appointment of the Panel.

No rights or legitimate interests

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii)of the Policy).

Bad faith

The Complainant has not shown that the disputed domain name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy). The Respondent registered the disputed domain name on the same date as the Complainant filed the trademark application relied upon and before that application was published. The Complainant states that the name "DIVASTASH" was not used commercially and not known to the public before publication of the trademark application on 5 July 2017. There is no evidence that the Respondent could have known of the Complainant's interest in the trademark or in the name "DIVA STASH" when it registered the disputed domain name. Although the Respondent has offered the disputed domain name for sale, there is no evidence that it registered the domain name for the purpose of selling it to the Complainant or a competitor of the Complainant within the meaning of paragraph 4(b)(i) of the UDRP or has otherwise acted in bad faith.

Procedural Factors

The Panel is satisfied that all procedural requirements under UDRP were met once the complaint was amended following an indication from the CAC.

Principal Reasons for the Decision

No evidence of bad faith. Disputed domain name was registered on same date as trademark application filed and before it was published or granted.

Decision

For all the reasons stated above, the Complaint is

Rejected

ADR.eu Case 2:17-cv-04168-DKD Document 1 Filed 11/13/17 Page 58 of 62

APR-29

and the disputed domain name(s) are to be

DIVASTASH.COM

Complaint rejected

Panellists

Name

Jonathan Turner

Date of Panel Decision

2017-10-14

Publication of the Decision

Publish the Decision

Home Tools About Contact

About the divastash.com - Basic Information

Website /

divastash.com

Domain

IP Address 167.114.213.199

Global Alexa

Rank

Country Alexa

Rank

Created on

2017-06-24T15:16:15Z

Expires on

Page Load Time

9.22 seconds

How socially engaged is divastash.com?











0

0 Share

0 Comments

0

0 Share 0

views

Where is divastash.com hosted?

167.114.213.199

City

Montréal

Region

QC

Area Code

0 0

Dma Code

Country Code

CA

Country Name Continent Code Canada NΑ

Latitude

45.504

Longitude

-73.5747

RegionCode

QC

RegionName

Quebec

Search

https://www.google

Check

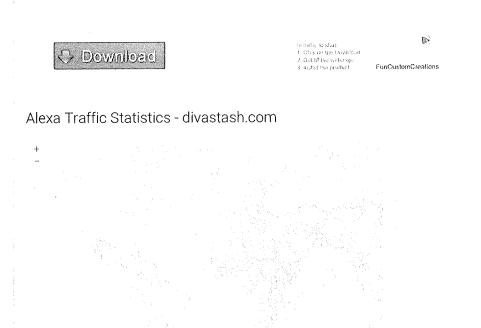
Newly Added

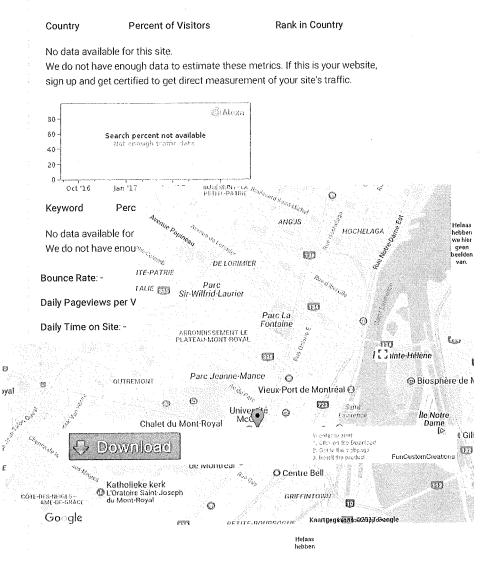
- (a) deepfink.org
- hyundaipole.com
- 🖺 topprospectstx.com
- () hangfold.win
- () lironghai.com
- © za599.com adaptcarolina.com
- xedulichlangson.net
- ¾ zyacintestosteronecomplex.net lianwuzhuangshi.com
- sequecomo.com
- xn--

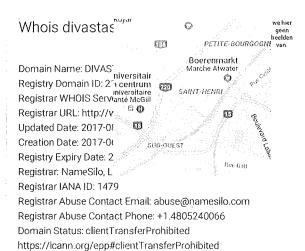
pss83kd1dlzkpum3yt51ucyl.com

- 3starcommunities.org
- ® wwwjs3309.com
- scalardevice.com
- 64levels.com
- (topgameforkids.com
- zoho.gallery
- но lifeskillshouse.com
- O czosąc.com









Name Server: NS1.DNSOWL.COM
Name Server: NS2.DNSOWL.COM
Name Server: NS3.DNSOWL.COM

DNSSEC: unsigned

URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/ >>> Last update of whois database: 2017-08-29T15:15:15Z <<< For more information on Whois status codes, please visit https://icann.org/epp NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration. TERMS OF USE: You are not authorized to access or query our Whois database through the use of electronic processes that are high-volume and automated except as reasonably necessary to register domain names or modify existing registrations; the Data in VeriSign Global Registry Services' ("VeriSign") Whois database is provided by VeriSign for information purposes only, and to assist persons in obtaining information about or related to a domain name registration record. VeriSign does not guarantee its accuracy. By submitting a Whois query, you agree to abide by the following terms of use: You agree that you may use this Data only for lawful purposes and that under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail, telephone, or facsimile; or (2) enable high volume, automated, electronic processes that apply to VeriSign (or its computer systems). The compilation, repackaging, dissemination or other use of this Data is expressly prohibited without the prior written consent of VeriSign. You agree not to use electronic processes that are automated and high-volume to access or query the Whois database except as reasonably necessary to register domain names or modify existing registrations. VeriSign reserves the right to restrict your access to the Whois database in its sole discretion to ensure operational stability. VeriSign may restrict or terminate your access to the Whois database for failure to abide by these terms of use. VeriSign

What is HTTP Headers of divastash.com

reserves the right to modify these terms at any time.

Transfer-Encoding: chunked
Connection: keep-alive
Vary: Accept-Encoding
Pragma: no-cache
X-Proxy-Cache: HIT
Cache-Control: no-store, no-cache, must-revalidate, post-check=0, pre-check=0



Afdelina Bedrijfswerkzaamheden

L101F (e-filing)

Alicante, 24/06/2017

Kamal Haiiri Weteringkade 22B NL-2515 AP Den Haag **NEDERLAND**

Ontvangst van een aanvraag van een Merk van de Europese Unie en mededeling van

> voorlopige toekenning van een indieningsdatum (artikel 25, lid 2 en artikel 27 UMV en regel 9 UMUV)

Aanvraagnummer:

016917536

Uw referentie:

Handelsmerk:

Aanvrager:

Soort handelsmerk:

DIVA STASH

Beeldmerk met tekst

Kamal Hajiri

Weteringkade 22B 2515 AP Den Haag

NEDERLAND



Wij berichten u dat uw aanvraag beschouwd wordt als Fast Track.

De geldende voorwaarden voor Fast Track (de snelle procedure) en de termijnen zijn te vinden op http:// euipo.europa.eu/fasttrack

elektronische aanvraag op **24/06/2017** Het Bureau heeft uw bovengenoemd aanvraagnummer gegeven. Gelieve bij al uw contacten of in al uw correspondentie met het Bureau met betrekking tot deze aanvraag dit nummer te vermelden.

Indien voldaan is aan de vereisten van artikel 27 EMVO is de datum van indiening van dit merk 24/06/2017.

Het Bureau moet de basisaanvraagtaks van 850 EUR binnen één maand na de datum van indiening van de aanvraag hebben ontvangen. Als u wilt dat uw aanvraag in 'fast track' (versnelde procedure) wordt behandeld, moet u onmiddellijk betalen.

Als uw aanvraag meer dan één klasse van waren en diensten bevat, zal voor elke extra klasse een aanvullende taks moeten worden betaald. De aanvullende taks bedraagt 50 EUR voor de eerste extra klasse en 150 EUR voor elke verdere extra klasse.

Indien u om nationale rechercheverslagen heeft verzocht dan moet u de bijbehorende taks van EUR 72. De aanvraag wordt gepubliceerd zodra alle rechercheverslagen aan u zijn meegedeeld.